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April 20, 2021

## Via ECF

Hon. Sidney H. Stein

United States District Court

Southern District of New York

500 Pearl Street

New York, New York 10007

**MEMO ENDORSED**

Re: *United States v. Shimen Liebowitz*, 16-cr-629 (SHS)

Dear Judge Stein:

We write to respectfully request permission for Mr. Liebowitz to travel to Brodskogeresztur, Hungary from April 21 to April 26.

Mr. Liebowitz pleaded guilty to conspiracy to commit kidnapping on July 27, 2017. Your Honor subsequently sentenced Mr. Liebowitz to twenty-four months imprisonment and three-years supervised release. Dkt. #130. Mr. Liebowitz was released from BOP custody on June 1, 2018. His term of supervised release is due to expire in about six weeks, on May 31, 2021.

Over the last year, Mr. Liebowitz has been volunteering for the Tzedek Association, a Jewish criminal justice reform organization, with the hope that it will turn into a job after his term of supervised release is completed. Tzedek is hosting an employee retreat and seminar in Brodskogeresztur, Hungary, at the site of the grave of a famous rabbi who is buried there. The retreat will be from April 21 to April 26. We therefore respectfully request permission from Your Honor for Mr. Liebowitz to join the Tzedek retreat.

I have spoken to Mr. Liebowitz's probation officer who informed me that Mr. Liebowitz has remained in compliance with the terms of his supervised release and that she has no objection to this travel request. AUSA Hartman also informed me that he has no objection.

Finally, we apologize to the Court for the lateness of this request but the possibility of this trip only recently arose.

Respectfully submitted,

/s/

Gedalia M. Stern

cc: AUSA Scott Hartman (via ECF)

4/20/2021  
Searched  
by H. Stein  
USOJ